## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

III IC	)
24 HOUR FITNESS WORLDWIDE, INC., et	) Chapter 11
al.,	) Case No.: 20-11558 (KBO)
Debtors.	) (Jointly Administered)
24 HOUR FITNESS WORLDWIDE, INC.,	
Plaintiff,	)
v.	)
CONTINENTAL CASUALTY COMPANY; ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY; STARR SURPLUS LINES INSURANCE COMPANY; ALLIANZ GLOBAL RISKS US INSURANCE COMPANY; LIBERTY MUTUAL INSURANCE COMPANY; BEAZLEY-LLOYD'S SYNDICATES 2623/623; ALLIED WORLD NATIONAL ASSURANCE COMPANY; QBE SPECIALTY INSURANCE COMPANY; and GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA,  Defendants.	Adv. Proc. No. 20-51051 (KBO)  Adv. Proc. No. 20-51051 (KBO)  Adv. Proc. No. 20-51051 (KBO)

## PLAINTIFF'S AMENDED DEPOSITION NOTICE TO LOURDES REYES

Pursuant to the Court's Amended Scheduling Order (Dkt. 172), Federal Rules of Civil Procedure 26 and 30, made applicable to the above-entitled adversary proceeding by Rules 9014 and 7030 of the Federal Rules of Bankruptcy Procedure, and Rule 7030-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, Plaintiff 24 Hour Fitness Worldwide, Inc. ("Plaintiff"), by and through its attorneys of record, shall take the oral and videotape deposition of **Lourdes Reyes at 9:00 a.m. pacific time on August 26, 2022**, or at such

other date and time as the parties may agree, and continue from day to day until the deposition is completed.

The deposition will proceed via web-based video conferencing software, and will be recorded by stenographic means. The deposition is to be taken for the purposes of discovery, examination, cross-examination, perpetuation of testimony, and any and all purposes allowed by law. Plaintiff will provide all parties with details regarding how to access the web-based video conferencing software no later than three calendar days before the deposition is set to begin.

Dated: July 25, 2022

## **REED SMITH LLP**

By: <u>/s/ Mark W. Eckard</u>

Mark W. Eckard (No. 4542) 1201 North Market Street, Suite 1500

Wilmington, DE 19801 Telephone: (302) 778-7500 Facsimile: (302) 778-7575

Email: meckard@reedsmith.com

David E. Weiss (admitted *pro hac vice*)
T. Connor O'Carroll (admitted *pro hac vice*)
101 Second Street, Suite 1800
San Francisco, CA 94105
Telephone: (415) 543-8700

Facsimile: (415) 391-8269 Email: dweiss@reedsmith.com cocarroll@reedsmith.com

COUNSEL FOR PLAINTIFF 24 HOUR FITNESS WORLDWIDE, INC.